

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION**

Samtellia Elmore,

Plaintiff,

vs.

Seit Pugoev and AzE, Inc.,

Defendant.

Civil Action No. 3:25-cv-02713-SAL

**COMPLAINT
(Jury Trial Requested)**

The Plaintiff above named, complaining of the Defendants herein, would respectfully show unto the Court:

1. The Plaintiff is a citizen and resident of the State of Georgia.
2. The Defendant, Seit Pugoev, is upon information and belief, a citizen and resident of the State of California.
3. Defendant AzE Inc., upon information and belief, a corporation organized and existing pursuant to the laws of the State of Illinois.
4. At all times herein mentioned and in regard to all matters herein mentioned Defendant AzE, Inc., acted by and through their agents, servants, and employees, who were at all times acting within the course and scope of their agency and employment, and for whose acts and omissions the Defendant is liable.
5. On or about December 24, 2023, in the County of Richland, State of South Carolina, Defendant Pugoev was operating a vehicle owned by Defendant AzE, Inc. while on private property, Defendant Pugoev exited a parking space, without ensuring it was clear to do so, and crashed into Plaintiff's vehicle. The resulting impact caused damage to the Plaintiff's vehicle and serious injuries to the Plaintiff.

5. The aforementioned collision was a direct and proximate result of the negligence and the recklessness of the Defendant Seit Pugoev as follows:

- a. in driving too fast for conditions;
- b. in failing to maintain a proper lookout;
- c. in operating his vehicle in an unsafe manner;
- d. in failing to use the degree of care and caution a reasonable and prudent person would have used under the same or similar circumstances;
- e. and in such other particulars as the evidence at trial may show.

6. The collision was a direct and proximate result of negligence and the recklessness of the Defendant AzE, Inc.as follows:

- a. in permitting an unsafe and poorly trained driver the use of their vehicle;
- b. in failing to use the degree of care and caution a reasonable and prudent person would have used under the same or similar circumstances;
- c. and in such other particulars as the evidence at trial may show.
- d. and in such other particulars as the evidence at trial may show.

7. As a direct and proximate result of the negligence and recklessness of the Defendant, the Plaintiff was injured as follows:

- a. suffered traumatic and permanent injury to her head, shoulder and back;
- b. incurred substantial medical expenses and will continue to incur such expenses in the future;
- c. suffered severe pain and mental anguish and will continue to so suffer in the future;
- d. suffered lost wages and an impairment of future wage earning;
- d. suffered an impairment in her ability to enjoy life.

8. As a result of the negligence and recklessness of the Defendants which injured the Plaintiff, she is informed and believes she is entitled to recover actual and punitive damages for which they are jointly and severally liable.

WHEREFORE, Plaintiff prays for judgment against the Defendants in an amount in excess of Twenty-Five Thousand (\$25,000.00) Dollars, actual and punitive damages, for the costs of this action, and for such other and further relief as the Court may deem just and proper.

Columbia, South Carolina
April 1, 2025

JURY TRIAL REQUESTED

s/Pamela R. Mullis
Pamela R. Mullis
MULLIS LAW FIRM
Post Office Box 7757
Columbia, South Carolina 29202
(803) 799-9577
prmullis@mullislawfirm.com